

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

IN RE TRICOR INDIRECT PURCHASER
ANTITRUST LITIGATION

Civil Action No. 05-00360 (KAJ)
(consolidated)

THIS DOCUMENT RELATES TO:

PAINTERS' DISTRICT COUNCIL NO. 30 HEALTH
AND WELFARE FUND and RICHARD G. WILDE,
C.A. No. 05-360(KAJ)

VISTA HEALTH PLAN, INC. and ROSS LOVE,
C.A. No. 05-365 (KAJ)

PENNSYLVANIA EMPLOYEES BENEFIT TRUST
FUND, C.A. No. 05-390 (KAJ)

ALLIED SERVICES DIVISION WELFARE FUND
and HECTOR VALDES, C.A. No. 05-394 (KAJ)

DIANA KIM, C.A. No. 05-426 (KAJ)

ELAINE M. PULLMAN, NEIL PERLMUTTER,
HELENA PERLMUTTER and LULA RAMSEY,
C.A. No. 05-450 (KAJ)

PHILADELPHIA FEDERATION OF TEACHERS
HEALTH AND WELFARE FUND, C.A. No. 05-467
(KAJ)

CINDY CRONIN, C.A. No. 05-482 (KAJ)

CHARLES SHAIN and SANDRA KRONE, C.A. No.
05-475 (KAJ)

LOCAL 28 SHEET METAL WORKERS, C.A. No.
05-516 (KAJ)

ALBERTO LITTER, C.A. No. 05-695 (KAJ)

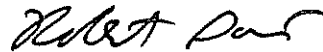
**UNOPPOSED MOTION TO FILE INDIRECT PURCHASER
PLAINTIFFS' BRIEF IN OPPOSITION TO DEFENDANTS' CONSOLIDATED
MOTION TO DISMISS PLAINTIFFS' COMPLAINTS UNDER SEAL**

The Indirect Purchaser Plaintiffs' hereby move for an Order permitting them to file Indirect Purchaser Plaintiffs' Brief in Opposition to Defendants' Consolidated Motion to Dismiss Plaintiffs' Complaints under seal. This motion is necessary because Indirect Purchaser Plaintiffs' Brief in Opposition to Defendants' Consolidated Motion to Dismiss Plaintiffs' Complaints contains information obtained from documents designated by defendants as highly confidential and produced to plaintiffs pursuant to Local Rule 26.2.

WHEREFORE, plaintiffs respectfully request entry of the attached Order permitting them to file Indirect Purchaser Plaintiffs' Brief in Opposition to Defendants' Consolidated Motion to Dismiss Plaintiffs' Complaints under seal. Counsel for the Indirect Purchaser Plaintiffs have conferred with Defendants and Defendants do not oppose this motion.

Dated: December 1, 2005

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***Liaison Counsel for Indirect Purchaser
Plaintiffs***

CERTIFICATE OF SERVICE


I, Robert R. Davis, do hereby certify that on this 1st day of December, 2005, I electronically filed the foregoing Motion and Proposed Order Permitting Indirect Purchaser Plaintiffs' Brief in Opposition to Defendants' Consolidated Motion to Dismiss Plaintiffs' Complaints to be Filed Under Seal using CM/ECF, which will send notification of such filing to all registered participants.

I hereby certify that on December 1, 2005, I sent by electronic mail the foregoing document to the following:

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